

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

MOSHE LAX, individually, as an executor of
the Chaim Lax Estate, as a trustee of the Chaim
Lax Family Trust, and as a trustee of the GAMA
Trust; ZLATY SCHWARTZ, individually, as
executor of the Chaim Lax Estate, as trustee of
the Chaim Lax Family Trust, and as a trustee of
the GAMA Trust; SHAINDY LAX; JUDITH
LAX; J.L., a minor, 299 HEWES STREET
REALTY CORP; 307 HEWES STREET
REALTY CORP; JBAM REALTY LLC, a/k/a
JBAM REALTY 2 LLC; BEN ZION
JACOBWITZ; TOBY JACOBWITZ; SL
HOLDINGS I, LLC; SL HOLDINGS II, LLC;
SL HOLDINGS III, LLC; SL HOLDINGS IV,
LLC; SL HOLDINGS V, LLC; DIAMOND
DYNAMICS LLC; KGK JEWELRY LLC;
CONGREGATION BAIS YEHUDAH
D'GANITCH; LX HOLDINGS LLC; MORRIS
SCHLAGER; GITTY SCHLAGER; JOSEPH
GREEN; HANNAH GREEN; HENNY
GREEN; and HERSHI GREEN,

Defendants.

No. 1:18-cv-04061-ILG-PK

Dist. Judge I. Leo Glasser

Mag. Judge Peggy Kuo

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U.S. DISTRICT COURT E.D.N.Y.

JAN 25 2021

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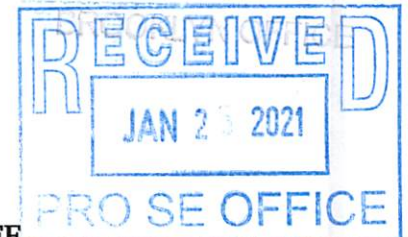
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DECLARATION OF MOSHE LAX IN OPPOSITION TO PLAINTIFF
UNITED STATES' MOTION FOR PARTIAL SUMMARY JUDGMENT

I, Moshe Lax, pursuant to 28 U.S.C 1746 declares as follows

1. I am a defendant , *pro se*, in the above captioned matter and making this declaration in opposition to the United States' motion for partial summary judgement.

2. Zlaty Schwartz is a co defendant in this matter and is represented by a James J Mahon who submitted an answer to the above caption matter on 1/11/2021.

3. Jay Pines has been retained by the firm of Becker & Poliakoff, LLP to act as forensic accountant in the above captioned AC acCcc CD x matter on behalf of my co defendant Zlaty Schwartz

4. Jay Pines has filed a declaration in opposition to the United States' motion for partial summary judgement (see doc 200)

5. I Zlaty Schwartz and myself were co-executors of the estate of Chaim Lax

6. I, Moshe Lax would to join in and adopt the defenses presented by Zlaty Schwartz, Jay Pines and James J. Mahon on behalf of my opposition to the United States' motion for partial summary judgement.

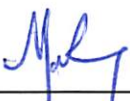
7. The defense arguments presented by Jay Pines applies just as well to my defense.

8. The defense and arguments presented by DEFENDANT ZLATY SCHWARTZ'S REPLY MEMORANDUM OF LAW IN OPOSITION TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGEMENT (see document 203) are just as relevant to defendant Moshe Lax as to defendant Zlaty Schwartz.

9. I respectfully request that the government's motion for partial summary judgment on the first cause of action against the estate of Chaim Lax should be denied, together with such other relief the Court deems necessary and proper.

Dated: New York, NY
January 25 , 2021

Respectfully submitted,

BY: 

Moshe Lax